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11 **UNITED STATES DISTRICT COURT**
12
13 **NORTHERN DISTRICT OF CALIFORNIA**
14
15 **SAN FRANCISCO DIVISION**
16

17
18 UNITED STATES OF AMERICA,) No. 17-MJ-70131 (LB)
19)
20 Plaintiff,) **STIPULATION AND [PROPOSED]**
21) **ORDER MODIFYING CONDITIONS**
22 v.) **OF PRETRIAL RELEASE TO**
23 JEFFREY WERTKIN,) **PERMIT TRAVEL**
24)
25 Defendant.)
26)
27)
28)

26 Jeffrey Wertkin and the United States Attorney's Office for the Northern District
27 of California, by and through their respective undersigned counsel, hereby stipulate

28 **STIPULATION AND [PROPOSED] ORDER RE TRAVEL**

United States v. Jeffrey Wertkin, No. 17-MJ-70131 (LB) 1

1 and agree as follows:

2 The Court admitted Mr. Wertkin to pretrial release under certain conditions. Dkt.
3 4. One such condition was that Mr. Wertkin not travel outside of certain specified
4 districts. *Id.* Mr. Wertkin's family has planned travel to the District of West Virginia with
5 members of his extended family between July 1 and July 9, 2017.

6 Undersigned counsel for Mr. Wertkin spoke with Mr. Wertkin's Pretrial Services
7 Officer, Ladreena Walton, who stated that her office has no objection to Mr. Wertkin
8 seeking leave of Court to travel to West Virginia for purposes of this family travel.

9 Accordingly, the parties stipulate and agree that the conditions of Mr. Wertkin's
10 pretrial release should be modified to permit him to travel to the District of West Virginia
11 between July 1 and July 9, 2017.

12 **SO STIPULATED:**

13 Dated: May 26, 2017

BRIAN J. STRETCH
United States Attorney

14 By: _____/s/
15 Robin Harris
16 Assistant United States Attorney

17 Dated: May 26, 2017

18 By: _____/s/
19 Raphael M. Goldman
20 ARGUEDAS, CASSMAN & HEADLEY, LLP
21 Counsel for Jeffrey Wertkin

22 **[PROPOSED] ORDER**

23 Pursuant to the parties' stipulation, IT IS SO ORDERED.

24 Dated: _____

25 By: _____
26 The Honorable Laurel Beeler
27 United States Magistrate Court Judge

28 **STIPULATION AND [PROPOSED] ORDER RE TRAVEL**